

AO 91 (Rev. 11/11) Criminal Complaint

U.S. DISTRICT COURT - N.D. OF N.Y.
<b>FILED</b>
MAY 22 2025
AT _____ O'CLOCK _____
John M. Domurad, Clerk - Plattsburgh

## UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA

v.

Jair CONTRERAS-LOPEZ

Case No. 8:25-MJ-151 (GLF)

Defendant.

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of May 20, 2025, in the county of St. Lawrence in the Northern District of New York the defendant violated:

*Code Section*


8 U.S.C. § 1326(a)

*Offense Description*

In that the defendant, an alien, after having been removed from the United States, was thereafter found in the United States without having obtained the express consent of the Secretary of the Department of Homeland Security or his successor for the reapplication for admission into the United States.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

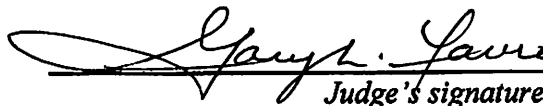


Complainant's signature

Special Agent Sean Carty

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: MAY 22, 2025


Judge's signature

City and State: Plattsburgh, NY

Hon. Gary L. Favro, U.S. Magistrate Judge

Printed name and title

I am a Special Agent ("SA") employed by the Department of Homeland Security ("DHS"), Homeland Security Investigations ("HSI") and have been since November 2022. I am currently assigned to the HSI Border Enforcement Security Taskforce ("BEST") in Massena, New York. BEST is tasked with the enhancement of border security by fostering coordinated efforts among federal, state, and local border and law enforcement officials to protect United States' border cities and communities from transnational crime, including but not limited to drug trafficking, arms smuggling, bulk cash smuggling, human trafficking and smuggling, violence, and kidnapping along and across the international borders of the United States. I am a graduate of the Criminal Investigator Training Program and the HSI Special Agent Training located at the Federal Law Enforcement Training Center in Glynco, Georgia. As an HSI SA, I have received training in investigating violations of federal statutes, including but not limited to narcotics smuggling and distribution, money laundering and bulk cash smuggling, human smuggling and arms smuggling.

Through my training and experience, I have become familiar with the U.S Immigration and Naturalization Act (INA), and violations of Title 8 of the U.S Code. I have been involved in investigations pertaining to alienage and nationality. I have initiated or supported investigations pertaining to illegal entry of aliens into the United States, issuing notices of inspection and identification and removal of criminal aliens. I have initiated or assisted with immigration operations, including those at Ports of Entry.

I make this application based upon my personal knowledge and upon information received by me from other law enforcement officials. The statements of fact contained in this attached sheet are based upon my personal knowledge, participation in the investigation, information provided by other law enforcement agencies, analysis of documents, and my experience and training as a Special Agent. As a result of my participation in this investigation, I am fully familiar with the facts and circumstances of the investigation.

On May 20, 2025, Homeland Security Investigations (HSI) agents, assisted by Immigrations and Customs Enforcement (ICE) – Enforcement and Removal Operations (ERO), the United States Border Patrol (USBP) and Federal Bureau of Investigations (FBI) conducted a worksite enforcement I-9 inspection of Tri-Town Meat Packing Corporation at 922 County Route 53 Brasher Falls, NY 13613.

HSI Special Agents (SA) arrived at the business and identified themselves as law enforcement and requested to speak with the owner and/or manager. SAs spoke with co-owners Jeff Liberty and Brian Liberty.

SAs issued a Notice of Inspection (NOI) to the owners and requested permission to speak to employees at the business in order to verify compliance with U.S. hiring and labor laws, specifically pertaining to I-9 compliance. The owners granted consent for SAs to speak with and engage with employees, they advised that there were approximately three employees that may be foreign nationals that working in the facility and that were residing in a mobile home located behind the facility. The owners were not able to provide their full names, dates of birth or other identifying information.

SAs located and interviewed three male individuals who were later identified as having no legal status to remain within the United States. One of the individuals, Jair CONTRERAS-LOPEZ stated he was a Mexican citizen, who entered without inspection, and was not in possession of any documents that would allow him to enter, remain, or be in the United States.

Due to the circumstances, Agents placed CONTRERAS-LOPEZ under arrest and transported him to the HSI Massena office. At the HSI office, CONTRERAS-LOPEZ was run through IDENT/IAFIS fingerprinting system revealing that CONTRERAS-LOPEZ was convicted of a criminal trespassing misdemeanor in Texas on April 20, 2022, and had a prior order of removal from the United States. CONTRERAS-LOPEZ was removed from the United States on August 4, 2022, through Harlingen, TX.